

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Helen Lawrence		Chapter 13 Proceeding
	Debtor(s)	19-11658-JKF
WELLS FARGO BANK, N.A.	Movant	
v. Helen Lawrence and Scott Waterman	Respondents	

OBJECTION TO CONFIRMATION OF PLAN

WELLS FARGO BANK, N.A. (Movant), a secured creditor in this case objects to the confirmation of the Debtor's Chapter 13 Plan and states the following:

1. The plan does not provide for the secured creditor, WELLS FARGO BANK, N.A., to receive the full value of its claim in violation of 11 U.S.C. §1325(a)(5)(B)(ii).
2. As of the date of the filing bankruptcy on March 19, 2019, Movant is the holder of a secured claim in the amount of \$74,728.94 secured by the Debtor's property located at 1127 Central Ave, Chester, PA 19013.
3. On or 05/08/2019, Movant filed a Proof of Claim setting forth the arrears to be paid through the plan at \$557.20. A copy of the Proof of Claim is attached hereto as Exhibit "A".
4. Debtor's plan does not provide for payment of pre-petition arrears claim of Movant. A copy of the Plan is attached hereto as Exhibit "B".
5. The plan as proposed does not address this claim of Movant, and therefore, the plan is not confirmable as the Debtor's options are to either provide for payment pursuant to 11 U.S.C.

§1325(a)(5)(B)(ii) or surrender pursuant to 11 U.S.C. §1325(a)(5)(C). The plan does neither, and therefore, the plan does not satisfy the confirmation requirement of 11 U.S.C. §1325(a)(1).

6. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

WHEREFORE, WELLS FARGO BANK, N.A. respectfully requests that confirmation of the plan be denied.

Respectfully Submitted,

POWERS KIRN, LLC

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Dated: May 10, 2019